

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

ALLAN CHIOCCHA,	)
Plaintiff,	)
	)
VS.	) C.A. NO. 1:19-cv-10482-WGY
	)
TOWN OF ROCKLAND, DEIRDRE	)
HALL, EDWARD KIMBALL, LARRY	)
RYAN, MICHAEL MULLEN, JR.,	)
MICHAEL O'LOUGHHLIN, RICHARD	)
PENNY and KARA NYMAN,	)
Defendants	)

---

**MOTION OF DEFENDANTS, FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF  
20 PAGES**

The defendants in this matter hereby move, pursuant to Local Rule 7.1(b)(4), that this Honorable Court grant them leave to file a memorandum in opposition to plaintiffs' Omnibus Motion to Compel. In support thereof, the defendants state that, given the complexity of the Motion, the numerous issues that need be addressed, the Omnibus fashion in which the Motion was filed, and the relief sought, as well as the volume and breadth of plaintiffs' submissions, the defendants respectfully request leave to file a memorandum in opposition to plaintiffs' Motion totaling no more than 30 pages, attached hereto as Exhibit A. This number is less than the eight defendants would separately be entitled to and it is in the interests of judicial economy for the defendants to file a single, omnibus opposition.

**WHEREFORE**, the respectfully request that this Honorable grant them leave to file a memorandum in excess of 20 pages.

**LOCAL RULE 7.1 CERTIFICATION**

In accordance with Local Rule 7.1(a)(2), undersigned counsel represents that they attempted to confer with plaintiff's counsel late in the day once they realized that additional pages would be needed but were unable to speak with plaintiff's counsel.

Respectfully submitted,

Defendants,

LARRY RYAN, MICHAEL MULLEN, JR.,  
MICHAEL O'LOUGHLIN, RICHARD  
PENNEY  
AND KARA NYMAN,  
By their Attorneys,

**PIERCE DAVIS & PERRITANO LLP**

*/s/ Jason W. Crotty*

---

Jason W. Crotty, BBO #656313  
Justin L. Amos, BBO #697232  
10 Post Office Square, Suite 1100  
Boston, MA 02109  
(617) 350-0950  
jcrotty@piercedavis.com  
jamos@piercedavis.com

Defendant

**DIERDRE HALL**

By her attorney,

**ROSE KALLOR, LLP**

**ROSE KALLOR, LLP**

*/s/ Cindy Cieslak*

---

Cindy Cieslak, BBO #685498  
750 Maine Street – Suite 11008-3  
Hartford, CT 06103  
(860) 361-7995  
ccieslak@rosekallor.com

Defendant

**EDWARD KIMBALL**

By his attorneys,

**TODD & WELD, LLP**

*/s/ Howard M. Cooper*

---

Howard M. Cooper, BBO #543842  
Tara D. Dunn, BBO # 699329  
One Federal Street, 27th Floor  
Boston, MA 02110  
(617) 720-2626  
hcooper@toddweld.com  
tdunn@toddweld.com

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing, filed through the Electronic Case Filing System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that a paper copy shall be served upon those indicated as non-registered participants on July 23, 2021.

*/s/ Tara D. Dunn*

---

Tara D. Dunn, Esq.